



Thanks for the info today Kevin.

Below is from one of my managers:

"Eric,

We can modify the existing SOW to include sampling and report writing for Tetrattech, no problem.

I think we need to consider Tetrattech performing the analytical as well. I consulted with contracts and they would prefer not to use a laboratory being paid for by Kemron. The conflict of interest potential is of concern. Rather we can use Tetrattech to keep the sample collection and analysis separate from ERRS. If there are insufficient funds in the Action Memo RST ceiling we can utilize contingency capacity or as a last resort transfer funds from the ERRS (which would have been used for the analytical) ceiling to RST.

I will contact R3 on Tuesday to request the change in scope. Please let me know about the analytical portion regarding available RST funding.

Thanks,

*Mark P. Pane, Leader
Removal Support Team
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So we are going to go thru CLP/EPA lab now. So I believe you spoke about that adding more to the sampling plan and who can actually do the sampling. If you can calculate that and how much lab cost would be for the first 6 (they changed it from 8 to 6) soil samples for the parameters I listed below in my email to my management. Then we can go from there once I figure out the finances. Mark will contact your office about amending the existing TDD.

Thanks again and have a great weekend.

Eric's E-mail to management:

I met with Dan Harkay today as suggested by Joe (Jim, I stopped by your office and Joe called you to join).

Due to the leaking UST (UST were mostly filled with non haz water according to data and surrounding soil emitted odors/visible staining), it was decided to change course a bit when dealing with the UST. When the Action Memo was writing based on site history and historical data, these UST were thought to have contained haz waste material, waste oil, other. Since our further assessment which included removing two UST from the ground, it is apparent that there is more UST material in the ground/groundwater than there is in the tanks themselves. Removing the tank contents, the UST, the visibly stained soil, and backfilling with clean soil would not remove the source of contamination and would in fact create more contaminated material (Clean fill interacting with contaminated). This would be a waste of time, money and not really address the problem.

Therefore, the tentative plan is to perform delineation sampling around the UST farm. ERRS (KEMRON) cannot perform the sampling. We will be excavating test pits (Which ERRS can do) but I need Tetra Tech personnel to handle the sample (Weston conflict of interest). I was told we could use the existing labs we have contracted but ERRS cannot handle the samples at all due to conflict of interest (delineation). So the chain of custody would be from Tetra Tech/OSC to the lab directly.

I would like to start this as soon as possible since we have already been delayed and now this extra

assessment piece has been added. The Tank farm (perimeter surrounding the two rows of 5 UST, map attached) is approximately 75 feet long and 50 feet wide. Each UST is 8 foot in diameter and 30 feet in length. Dan proposed a tentative assessment/sampling plan to include digging 6 test trenches around the outside of the tank farm (2 along the 75 foot stretch and 1 in the middle of the 50 foot side). Each trench will consist of three vertical sample levels. One sample obtained at 4 feet below grade (approximately in the middle of the tank), one sample taken above the saturation zone (approximately 8 feet below grade at groundwater level), and one sample taken about 10 feet below grade (approximately 2 feet below the base of the tank). We will also attempt to excavate deeper in order to determine if there is a clay layer.

I have estimated this initial sampling phase to take about 3 days. I spoke to Kevin Scott from Tetra Tech earlier this afternoon. As indicated previously by Mark Pane, we have a TDD with Tetra Tech that is good until the end of the year. When we looked into this TDD last month, there was \$20K left on this existing TDD (Task Order 0178). I have attached the TDD information. Mark, I am requesting your guidance on revising this TDD to include soil sampling (I don't believe it is specifically listed) and also to include a Final Cleanup Report (Similar to a Remedial Action Report if the site was on the NPL). At this point, I do not think we will need to request additional funds. Kevin Scott and I went over the hours and for this first phase, it will cost approximately \$5,000 (Labor and ODC). If the initial analytical results warrant us to perform a second phase of sampling located further away from the UST Farm envelope, then we can address adding funds at that time. Kevin informed me that he could have someone come to the site as early as next week (as long as the proposed plans/contracting/lab is acceptable).

The following parameters will be requested for the soil analysis: Dioxin, Metals (TAL), VOC, SVOC, PCB, PEST/HERB. We will reduce the suite of analytes for the second phase if needed.

Once analytical is reviewed, the team can come up with:

- 1) cleanup criteria (based on existing surrounding site cleanup criteria/NJ State?),
- 2) risk (Chuck Nace)
- 3) cost estimate a cleanup
- 4) determine if this soil removal will be performed under this existing removal action or not.